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7 HEARST CORPORATION

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10 Attorneys for Defendant

HEARST COMMUNICATIONS, INC.

12 **UNITED STATES DISTRICT COURT**

13 **NORTHERN DISTRICT OF CALIFORNIA**

14 SHAHID BUTTAR FOR CONGRESS
15 COMMITTEE, et al.,

16 Plaintiffs,

17 vs.

18 HEARST COMMUNICATIONS, INC.,

19 Defendant.

Case No. 3:21-cv-05566-EMC

**DECLARATION OF DIEGO IBARGUEN IN
SUPPORT OF DEFENDANT HEARST
COMMUNICATIONS, INC.'S MOTION FOR
ATTORNEYS' FEES AND COSTS**

[Cal. Civ. Proc. Code § 425.16]

Judge: Hon. Edward M. Chen

Date: April 6, 2023

Time: 1:30 p.m.

Place: Courtroom 5, 17th Floor

22 **DECLARATION OF DIEGO IBARGUEN**

23
24 I, DIEGO IBARGUEN, declare:

25 1. I am an attorney duly admitted to practice law in the State of New York, and I
26 have been admitted to practice before this Court *pro hac vice* in connection with this matter. I
27 am employed as Senior Counsel in the Office of General Counsel for The Hearst Corporation
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1 (“Hearst”), and I represent defendant Hearst Communications, Inc. (“Hearst” or “Defendant”) in
2 this matter. I make this Declaration in support of Defendant’s Motion for Attorneys’ Fees and
3 Costs. The matters stated herein are true of my own personal knowledge, except for those
4 matters expressly stated on information and belief, which matters I believe to be true.

5 **Background**

6 2. On February 16, 2023, following full briefing and oral argument, this Court
7 granted, with prejudice, Hearst’s motion to dismiss Plaintiffs Shahid Buttar for Congress
8 Committee and Shahid Buttar’s (collectively, the “Buttar Plaintiffs” or “Plaintiffs”) First
9 Amended Complaint in its entirety under California’s anti-SLAPP statute (California Code of
10 Civil Procedure § 425.16). ECF No. 67, (the “Feb. 16 Order.”) The Court had previously
11 dismissed Plaintiffs’ original Complaint on the same grounds on April 25, 2022, granting
12 Plaintiffs an opportunity to amend. ECF No. 39, (the “First MTD Order.”)

13 **Notice to Plaintiffs of Their Meritless Claims and Plaintiffs’ Conduct Causing Defendant to**
14 **Incur Fees and Costs**

15 3. Plaintiffs’ needlessly forced Hearst to incur significant legal fees (both for in-
16 house and outside local counsel) and costs associated with mounting a legal defense, including
17 the preparation and filing of two anti-SLAPP motions to dismiss. Throughout, Plaintiffs were
18 put on notice of the deficiencies of their legal claims and the fact that Hearst would respond to
19 the Complaint and First Amended Complaint by filing a motion to dismiss pursuant to the anti-
20 SLAPP statute which, if successful, would result in a mandatory award of attorneys’ fees and
21 costs for Hearst.

22 4. On or about October 27, 2021, Thomas R. Burke, a member of Davis Wright
23 Tremaine LLP and outside counsel for Hearst in this matter spoke by telephone with Plaintiffs’
24 counsel, Gautam Dutta, and in that and subsequent email communications conveyed Hearst’s
25 intent to file a motion to dismiss under the anti-SLAPP statute in response to the Complaint.
26 This intent was plainly evident in the parties’ joint stipulation regarding a proposed briefing
27 schedule, filed with the Court on November 23, 2021. ECF No. 21.

1 5. Nevertheless, though plainly on notice of the flaws with their legal arguments and
2 of Hearst's intent to pursue all available legal remedies, including the recovery of attorneys' fees
3 and costs under the anti-SLAPP statute, Plaintiffs proceeded with this litigation. Upon dismissal
4 of the original Complaint following full briefing and argument on Hearst's motion to dismiss
5 pursuant to the anti-SLAPP statute (First MTD Order), Plaintiffs filed a First Amended
6 Complaint on August 12, 2022 (ECF No. 46, the "FAC") which repeated and realleged
7 substantially the same legal theories and factual content already deemed insufficient by the
8 Court; the FAC was dismissed in its entirety with prejudice by the Court in its Feb. 16 Order.

9 6. As detailed below, Plaintiffs' actions in prosecuting these claims in the original
10 Complaint and the FAC needlessly forced Hearst to incur substantial legal fees and costs which
11 Hearst now seeks to recover under California Code of Civil Procedure § 425.16(c)(1).

12 **Hearst's Reasonable Fees and Expenses**

13 7. As set forth and supported in this Declaration, Hearst by this Motion seeks an
14 award of \$20,479.55 in outside counsel fees billed through December 2022; \$59,280 in fees
15 sought for work on this matter performed by Hearst's in-house counsel, and \$634 in costs
16 incurred in defending this litigation, including amounts incurred in bringing its successful
17 motions to dismiss the Complaint and the FAC and amounts incurred in bringing this Motion for
18 Award of Attorneys' Fees. (Additional fees and expenses incurred in connection with this
19 Motion, as well as any as yet unbilled outside counsel fees, will be reflected in a supplemental
20 declaration filed with Hearst's reply papers after those expenses are incurred).

21 8. As explained herein and in the Memorandum filed in support of this Motion,
22 Hearst's request is reasonable based on the time and expertise that was required to address the
23 claims asserted in Plaintiffs' First Amended Complaint, the actual amounts billed to Hearst by its
24 outside counsel, the actual costs incurred by Hearst in connection with obtaining pro hac vice
25 admission to this Court, the expertise and experience of Hearst's counsel, and the complete
26 success obtained by Hearst's counsel.

1 **The Hearst Office of General Counsel:**

2 9. The Hearst Office of General Counsel (“Hearst OGC”) is the legal department of
3 The Hearst Corporation, one of the nation’s largest diversified media companies. Hearst OGC
4 operates as a full-service in-house boutique law firm with a national practice. It directly
5 represents Hearst entities and their employees in a wide range of litigations, as well as
6 transactional and regulatory matters. It is responsible for all legal matters involving Hearst’s
7 media interests, which include newspaper and business publishing, newspaper features
8 distribution, magazines, cable networks, television and radio broadcasting, Internet businesses,
9 television production and distribution, and real estate. Headquartered in New York City, it is
10 staffed by approximately thirty lawyers with significant experience at major law firms prior to
11 joining Hearst OGC.

12 10. Hearst OGC has particular expertise in the area of media law and First
13 Amendment litigation. Its leadership in this area starts at the top. Hearst’s Executive Vice
14 President and Chief Legal Officer Eve Burton is a prominent communications law attorney and a
15 nationally-recognized First Amendment litigator. Prior to joining Hearst in 2002, Ms. Burton
16 was Vice President and Chief Legal Counsel at CNN, where she led the network’s successful
17 effort to obtain audio access to the U.S. Supreme Court in *Bush v. Gore*. Previously, she was
18 Vice President and Deputy General Counsel at the New York Daily News. Ms. Burton has won
19 numerous awards for her First Amendment and media advocacy. She has been a visiting lecturer
20 in constitutional law and journalism at the Columbia Graduate School of Journalism and has
21 published numerous articles on media access, First Amendment issues, and media law in law
22 journals and newspapers.

23 11. Hearst’s Senior Vice President and Co-General Counsel Jonathan R. Donnellan
24 leads Hearst OGC’s litigation practice group, which handles all litigation, newsroom counsel,
25 and content-related matters for the company. Consisting of eleven attorneys, Hearst OGC
26 litigators represent Hearst and its affiliates in all litigation matters, working with outside counsel
27 as necessary. Mr. Donnellan regularly serves as lead counsel for Hearst in state and federal trial
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1 and appeals courts across the country.

2 12. Mr. Donnellan's media law practice and expertise includes the following
3 representative cases in recent years: *Shuler v. Garrison*, No. 2:16-cv-695-RDP, 2017 WL
4 191267 (N.D. Ala. Jan. 13, 2017) (dismissing, *inter alia*, defamation claim against Hearst);
5 *Kelly-Brown v. Winfrey*, 659 F. App'x 55 (2d Cir. 2016) (affirming summary judgment in favor
6 of Hearst and codefendants on trademark claim involving, *inter alia*, use of a phrase on the cover
7 of a magazine); *Ranbaxy Labs. Inc. v. First Databank, Inc.*, 826 F.3d 1334 (11th Cir. 2016)
8 (affirming summary judgment in favor of Hearst subsidiary on defamation claim); *Farah v.*
9 *Esquire Magazine*, 736 F.3d 528 (D.C. Cir. 2013) (affirming dismissal of defamation claim
10 against Hearst magazine); *Stotler v. Orlando Hearst Television Inc., d/b/a WESH-TV*, No. 5D11-
11 3178, Slip Op. (Fla. 5th Dist. Ct. App. June 26, 2012) (affirming summary judgment for Hearst
12 in defamation action); *In re Hearst Newspapers, LLC*, 641 F.3d 168 (5th Cir. 2011) (reversing
13 trial court's denial of access to Hearst newspaper and holding that public and press have
14 constitutional right to attend the sentencing of a criminal defendant); *Brooks v. S.F. Chronicle*,
15 No. A125046, 2010 WL 3594489 (Cal. Ct. App. Sept. 16, 2010) (affirming grant of anti-SLAPP
16 motion dismissing defamation claim against Hearst newspaper); *Rivera v. First Databank, Inc.*,
17 187 Cal. App. 4th 709 (2010) (reversing denial of anti-SLAPP motion by Hearst subsidiary);
18 *O'Connor v. S.F. Chronicle*, Case No. CGC 09-495215 (S.F. County Super. Ct. Nov. 16, 2010)
19 (granting anti-SLAPP motion dismissing defamation claim against Hearst newspaper); *Yeakey v.*
20 *Hearst Commc'ns, Inc.*, 234 P.3d 332 (Wash. Ct. App. 2010) (reversing denial of motion to
21 dismiss defamation claim against Hearst newspaper); *Hearst Television, Inc. v. Norris*, 54 A.3d
22 23 (Pa. 2012) (reversing denial of access to Hearst television station under state Right to Know
23 Law); *Capital Newspapers Div. of Hearst Corp. v. City of Albany*, 933 N.E.2d 207 (N.Y. 2010)
24 (reversing denial of access to Hearst newspaper under state Freedom of Information Law). Mr.
25 Donnellan is admitted to the Bars of the United States Supreme Court; the U.S. Courts of
26 Appeals for the First, Second, Third, Fifth, Seventh, Eighth, Ninth, Eleventh and D.C. Circuits;
27 the U.S. District Courts for the Southern, Eastern and Northern Districts of New York, the
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1 District of Connecticut, the Eastern District of Michigan, the Southern, Eastern and Western
2 Districts of Texas; and the states of New York and Texas.

3 13. In addition to his media law practice, Mr. Donnellan has been a law school
4 professor on the topic since 2006. Most recently he was an adjunct professor at Columbia Law
5 School, where he taught a seminar on The First Amendment and The Press. He has also taught a
6 variety of other courses on First Amendment and media law at Fordham University School of
7 Law and Brooklyn Law School over the years. Mr. Donnellan is also a member of the faculty of
8 the Practicing Law Institute, for its annual program on Communications Law in the Digital Age,
9 where he has been a panelist on the topic of defamation law and practice since 2015. Before
10 joining Hearst in 2003, Mr. Donnellan was Vice President and Deputy General Counsel for the
11 New York Daily News from 2002 to 2003 and Assistant General Counsel for CNN from 2001 to
12 2002. Previously, he practiced from 1991 to 2001 at the firm Cahill Gordon & Reindel in New
13 York City, where he focused primarily on First Amendment law and the representation of media
14 clients. He is a frequent speaker around the country and internationally on legal and ethical
15 issues relating to media law and the First Amendment, and has published articles and book
16 excerpts on those topics. Mr. Donnellan received his J.D. from the New York University School
17 of Law in 1991. He has served as chair of the New York City Bar Association's Committee on
18 Communications Law, co-chair of the ABA's First Amendment Litigation Committee, a member
19 of the Governing Committee of the ABA's Forum on Communications Law, and as a Trustee of
20 the Media Law Resource Center Institute.

21 14. Assisting Ms. Burton and Mr. Donnellan in leading Hearst's litigation practice is
22 Deputy General Counsel Ravi V. Sitwala. Mr. Sitwala has significant experience in First
23 Amendment and media law litigation and has appeared numerous times in matters before state
24 and federal trial and appeals courts. Representing Hearst for over the past fourteen years, he has
25 provided legal counsel to Hearst entities on all manner of litigation matters, including defamation
26 defense, intellectual property, and other matters. Among other matters, Mr. Sitwala has led the
27 defense of Hearst's First Databank in numerous matters seeking to impose liability based on
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1 FDB's role as an independent publisher of drug and medical device information. Prior to joining
2 Hearst in 2008, he worked as a litigation associate from 2005 to 2008 at the firm Patterson
3 Belknap Webb & Tyler in New York City, where he worked on a wide variety of litigation
4 matters, with a primary focus on intellectual property. From 2004 to 2005, he worked as a law
5 clerk in the chambers of the Hon. Julio M. Fuentes of the U.S. Court of Appeals for the Third
6 Circuit. He received his J.D. from the New York University School of Law in 2004. He is a
7 member of the New York City and State Bar Associations' Committees on Communications and
8 Media Law.

9 15. I also have significant experience in First Amendment and media law litigation
10 and have appeared numerous times in matters before state and federal trial and appeals courts.
11 As Counsel for Hearst since 2013 and Senior Counsel since October 2022, I have provided legal
12 counsel to Hearst entities on all manner of newsroom issues, including defamation defense,
13 access to records and proceedings of public agencies and courts around the country,
14 newsgathering, copyright and more. Since January 2022, I have served as an adjunct professor at
15 New York University where I teach an undergraduate seminar on Journalism Ethics and First
16 Amendment Law in NYU's Arthur L. Carter Journalism Institute. My work on First
17 Amendment and press related matters also includes volunteer roles as an elected member of the
18 Steering Committee of the Reporter's Committee for Freedom of the Press and as an elected
19 Trustee of New York Public Radio. I have been an active member of the New York City Bar
20 Association's Committee on Communications Law and of the New York State Bar Association
21 Committee on Media Law for many years. Prior to joining Hearst in 2013, I worked as a
22 litigation associate from 2007 to 2013 at the firm Cahill Gordon & Reindel in New York City,
23 where I worked on a wide variety of litigation matters, with a primary focus on First Amendment
24 issues and the representation of media clients. From 2006 to 2007, I worked as a law clerk in the
25 chambers of the Hon. Anthony J. Scirica, then-Chief Judge of the U.S. Court of Appeals for the
26 Third Circuit. I received my J.D. from Yale Law School in 2006. Before law school, I worked
27 as a Newsman for The Associated Press and a White House correspondent for Knight Ridder
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1 Newspapers.

2 16. Both Mr. Donnellan and I are admitted *pro hac vice* in this matter. Throughout
3 the course of this litigation, Mr. Donnellan has performed an overall supervisory role in the
4 strategy and management of the litigation and has had ultimate responsibility for the
5 representation of Hearst in this case. Mr. Donnellan has also reviewed and provided me with
6 comments on drafts of Hearst's papers, as has Mr. Sitwala.

7 17. I have been responsible for all aspects of the day-to-day management of the case,
8 including review and analysis of Plaintiffs' filings in this case; development of a defense
9 strategy; legal research on the host of claims brought by Plaintiffs and on legal arguments in
10 opposition to those claims; development of the factual record in this case; drafting, revising and
11 finalizing Hearst's motion to dismiss the Complaint and the related reply, and representing
12 Hearst in oral argument on that motion; drafting, revising and finalizing Hearst's motion to
13 dismiss the FAC and the related reply, and representing Hearst in oral argument on that motion;
14 and drafting, revising and filing this Motion; as well as drafting, revising and finalizing all
15 accompanying court filings, including declarations accompanying Hearst's filings. In addition, I
16 have also been primarily responsible for client communication with Hearst, and for
17 communication with our local counsel. Throughout the course of this litigation I have frequently
18 consulted with Mr. Donnellan, Mr. Sitwala and other litigation colleagues in the Hearst OGC,
19 and our local counsel on matters of legal strategy related to this matter.

20 18. Attached as Exhibit A is a time record reflecting Hearst OGC time spent in
21 connection with this litigation for which Hearst seeks an award of attorneys' fees. As reflected
22 in Exhibit A, Hearst has limited its request for in-house attorneys' fees only to time spent on this
23 matter by me; Hearst does not seek to recover fees for the time Mr. Donnellan has spent on this
24 matter, for example, discussing and developing Hearst's litigation strategy with me and time he
25 and Mr. Sitwala have spent reviewing and commenting on drafts of Hearst's motion papers. Nor
26 does Hearst seek to recover fees for the extensive time spent by Hearst OGC's senior paralegal
27 assisting me with various aspects of the litigation, including the finalization of litigation
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documents.

19. I prepared Exhibit A from task and time annotations I maintain in the ordinary course of my professional practice in daily task notebooks and which I have maintained over the course of this litigation; I have also reviewed electronic records including e-mail archives, word processing files, and Hearst OGC's digital record keeping system, to estimate my actual time spent on tasks performed in this matter. In the course of preparing Exhibit A, I have significantly reduced or completely written off much of the time spent on this matter in order to arrive at what I believe to be a reasonable and appropriate reflection of the substantial work I performed on this matter. For example, where the time I actually spent appeared unnecessary or duplicative of other work done on this case, or where the time actually spent appeared to exceed reasonably necessary amounts of time for the particular tasks performed, I have reduced such time entries downward or written them off completely.

20. The following chart summarizes the hours of legal work, with an associated billing rate, performed by me during the course of this litigation, as described in Exhibit A:

1. Legal and Factual Research, Preparation of Motions to Dismiss and Accompanying Declarations and Filings.

Name	Hourly Rate	Hours Expended	Amount
D. Ibarguen	\$600	46.2	\$27,720

2. Review of Plaintiffs' Opposing Papers, Legal Research, Preparation of Replies and Supporting Declarations and Additional Reply Papers.

Name	Hourly Rate	Hours Expended	Amount
D. Ibarguen	\$600	31.0	\$18,600

3. Preparation for and Appearance at Hearings on both Motions to Dismiss.

Name	Hourly Rate	Hours Expended	Amount
D. Ibarguen	\$600	14.0	\$8,400

4. Preparation of Motion for Fees and Costs.

Name	Hourly Rate	Hours Expended	Amount
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D. Ibarguen	\$600	7.6	\$4,560
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21. The hourly rate noted above charged by Hearst OGC is consistent with what I understand to be customary market rates charged with comparably experienced litigation counsel in matters featuring complexities similar to this matter. Hearst OGC is familiar with the prevailing rates for First Amendment Counsel in the State of California through interviewing and retaining counsel in connection with various Hearst matters in California. As noted below, Hearst's outside counsel in this matter billed Hearst at an hourly rate of \$643.

Hearst's Outside Counsel Fees and Costs:

22. Because Hearst OGC is located in New York and neither Mr. Donnellan nor I are members of the California Bar, Hearst obtained local counsel to assist Hearst OGC with this litigation. Our local counsel, Thomas R. Burke, is a partner with Davis Wright Tremaine LLP, has more than thirty years of experience in private practice with a concentration on First Amendment and media law matters, and regularly represents publishing and broadcasting clients in California, including Hearst. For nearly 20 years, Mr. Burke was a Continuing Lecturer on Media Law at the Graduate School of Journalism at the University of California, Berkeley. He is the author of "Anti-SLAPP Litigation" (The Rutter Group 2013-present) and a Contributing Editor to Weil & Brown, "Cal. Practice Guide: Civil Procedure Before Trial" (The Rutter Group 2014-present) (Anti-SLAPP Motions).

23. Throughout this litigation, and as is reflected in the invoices attached as Exhibit B, Mr. Burke has provided counsel on strategy, reviewed and provided comment on litigation documents prepared by Hearst OGC, and consulted on filing of Hearst's papers. Mr. Burke also appeared on Hearst's behalf at the November 30, 2021 Case Management Conference.

24. As reflected in Exhibit B, Mr. Burke billed Hearst for a total of \$20,479.55 in legal services through December 2022, representing 33.6 hours of legal work billed at an hourly rate of \$643. Upon information and belief, this hourly rate is hundreds of dollars below Mr. Burke's standard hourly rates customarily charged to his clients in 2021-2023, owing to the

1 substantial discount that DWT provides Hearst Corp. based on its long-standing relationship.

2 25. Furthermore, Hearst incurred costs totaling \$634 in connection with this litigation
3 in connection with fees associated with Mr. Donnellan and my *pro hac vice* motions, which are
4 reflected in receipts attached as Exhibits C and D.

5 **Communications with the Buttar Plaintiffs:**

6 26. Pursuant to L.R. 54-5(a), counsel for the parties in this matter met and conferred
7 regarding this Fees Motion on a telephonic conversation on February 28, 2023 and in subsequent
8 email correspondence, in which I informed counsel for Plaintiffs of our intent to file this fees
9 motion, the number of hours and hourly rates reflected in the motion, and the total amounts of
10 attorneys' fees and costs sought in connection with this matter. Counsel were unable to resolve
11 disputed issues relating to such fees and costs.

12 I declare, under penalty of perjury under California law and the laws of the United States,
13 that the foregoing is true and correct.

14 Executed in Edgewater, New Jersey, on March 2, 2023.

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17 s/ Diego Ibarguen
18 Diego Ibarguen
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Exhibit A

Diego Ibarguen Attorney Time Records
Shahid Buttar for Congress Committee, et al., v. Hearst Communications, Inc.,
Case No. 21-cv-05566-EMC

Date	Hours	Description
07/22/21	3	Review and analyze unserved Complaint which was forwarded by client after learning of filing; review client's underlying articles at issue in Complaint; confer with client re: same; discussing complaint and initial strategy issues with J. Donnellan by telephone; emails w/ local counsel (T. Burke).
07/23/21	1.5	Preparation of preservation directive for client; phone calls w client re: background on allegations in Complaint.
07/24/21	2	Discussion with J. Donnellan re: legal standards and possible defenses available, discussion of possible anti-SLAPP motion; research re: same.
08/04/21	0.4	Teleconference with local counsel (T. Burke) re: unserved Complaint, strategy and available defenses including anti-SLAPP motion, failure to sufficiently plead actual malice, failure to demand correction.
10/12/21	0.2	Review of complaint service copy served on Hearst Communications through its corporate agent; emails w local counsel re: same.
10/13/21	0.1	Emails with client alerting them of service of Complaint.
10/26/21	1	Research on anti-SLAPP standards, substantial truth, actual malice, correction statute, associational standing for campaign; emails re: same with J. Donnellan; email with client confirming Plaintiffs failed to make correction demand.
10/27/21	1.5	Research and review of materials on correction statute requirements; drafting anti-SLAPP motion; call w local counsel (T. Burke) re: strategy issues and legal defenses for anti-SLAPP motion and agreement to seek extension of time from Plaintiffs to file anti-SLAPP motion.
11/17/21	1	Drafting pro hac vice papers
11/21/21	1	Drafting anti-SLAPP motion
11/22/21	1	Drafting anti-SLAPP motion
11/26/21	2	Drafting anti-SLAPP motion
11/27/21	4	Drafting anti-SLAPP motion
11/28/21	4	Drafting anti-SLAPP motion; emails w J. Donnellan and local counsel seeking comments re: draft.
11/29/21	2	Revisions to anti-SLAPP motion based on comments from J. Donnellan and T. Burke; preparation of accompanying declaration.
11/30/21	1	Revisions to anti-SLAPP papers based on additional comments from R. Sitwala.
12/01/21	2	Revisions to anti-SLAPP papers
12/02/21	2	Finalizing anti-SLAPP papers.
01/26/22	1	Review and analyze opposition papers
02/01/22	2	Discussion with T. Burke of opposition to anti-SLAPP motion, arguments for reply related to burdens of showing falsity, actual malice, compliance with corrections statute, possible inclusion of purported "correction demand" relied on but not included by Plaintiffs; research re same.
02/14/22	3	Draft reply brief
02/15/22	3	Draft reply brief
02/16/22	1.5	Revise reply brief; communications with T. Burke re: same.
02/17/22	2	Revise reply brief
02/18/22	1.5	Revising draft reply brief based on comments from J. Donnellan, R. Sitwala and T. Burke.
02/21/22	2	Revise draft reply brief; prepare accompanying declaration
02/21/22	2	Finalizing reply brief and accompanying filings.

Date	Hours	Description
03/10/22	2	Preparation for oral argument on anti-SLAPP motion
03/11/22	3	Preparation for oral argument on anti-SLAPP motion; moot with J. Donnellan, R. Sitwala, T. Burke
03/15/22	2	Preparation for oral argument on anti-SLAPP motion, second moot argument with J. Donnellan, R. Sitwala.
03/17/22	1.5	Preparation for argument and oral argument before Judge Chen on anti-SLAPP motion.
04/25/22	0.5	Review of Judge Chen's Order dismissing Complaint; discussion of same with T. Burke, J. Donnellan and client
08/18/22	1	Review of Plaintiffs' First Amended Complaint
09/20/22	2.5	Reviewing Plaintiffs' FAC, drafting anti-SLAPP motion
09/21/22	7.5	Drafting anti-SLAPP motion (FAC) and accompanying declaration and other papers
09/22/22	4	Revising anti-SLAPP motion (FAC) based on comments from R. Sitwala, T. Burke and accompanying declaration and other papers
09/23/22	2	Finalizing anti-SLAPP motion (FAC) and accompanying filings
10/22/22	0.5	Review of Plaintiffs' opposition to anti-SLAPP motion (FAC).
10/27/22	0.5	Review of amicus filed by Rutgers Center for Security, Race and Religion.
11/06/22	2	Draft reply brief (FAC).
11/08/22	3	Draft reply brief (FAC).
11/09/22	2	Draft reply brief (FAC).
11/10/22	1	Draft reply brief (FAC).
11/12/22	1	Revision of Reply brief (FAC) incorporating comments from R. Sitwala, T. Burke
11/14/22	2	Finalizing reply brief (FAC) and accompanying declaration and other filings
01/30/23	2	Preparing for oral argument on anti-SLAPP motion (FAC)
02/01/23	2	Preparing for oral argument on anti-SLAPP motion (FAC)
02/02/23	1.5	Preparing for oral argument and oral argument before Judge Chen on anti-SLAPP motion (FAC).
02/16/23	0.5	Review of Judge Chen's Order dismissing FAC
02/17/23	0.1	Communication with client re: dismissal of FAC
02/26/23	3	Drafting fees motion and accompanying declarations
02/27/23	4	Drafting fees motion and accompanying declarations

TOTAL 98.8 hours @ \$600/per hour = \$59,280

TOTAL FEES = \$59,280

Exhibit B



Anchorage | Bellevue | Los Angeles | New York
Portland | San Francisco | Seattle | Washington, D.C.

920 Fifth Avenue
Suite 3300
Seattle, WA 98104-1610
T 206.622.3150
F 206.757.7700
Federal ID # 91-0839480
DWT.COM

The Hearst Corporation
Jonathan Donnellan, Esq.
300 West 57th Street
40th Floor
New York, NY 10019

September 30, 2021
Invoice #6848488
ELECTRONIC BILLING

Matter Name: Buttar v. Hearst Communications / SF Chronicle
Firm Matter Number: 0063971.000087
DWT Attorney: Thomas Burke (thomasburke@dwt.com)

Client's Matter Number: 2021-LG-1025874

Invoice for Fees and Costs
ELECTRONIC BILLING – DO NOT MAIL
FOR FILING PURPOSES ONLY

Total Current Fees	771.60
Total Current Costs	0.00

Total Amount Due This Invoice	\$ 771.60
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BILLING SUMMARY

YEAR-TO-DATE

Billed Fees	\$771.60
Billed Costs	\$0.00
TOTAL	\$771.60

LIFE-TO-DATE

Billed Fees	\$771.60
Billed Costs	\$0.00
TOTAL	\$771.60

PROFESSIONAL FEES RENDERED:

To ensure proper credit to your account,
please include remittance with your payment.

Client Name: Hearst Corporation, The
Firm Matter Number: 0063971.000087
DWT Attorney: Thomas Burke



Invoice # 6848488
Page 2 of 3

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>HOURS</u>	<u>AMOUNT</u>	<u>NARRATIVE</u>
08/04/21	T. Burke	1.20	771.60	Close review of plaintiff's complaint and underlying articles in dispute in preparation for initial client conference (.80); conference (via Zoom) with J. Donnellan and D. Ibarguen regarding background and initial strategy (.40)
TOTAL		1.20	\$771.60	

TIMEKEEPER SUMMARY			
<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
PARTNER			
Burke, T.	1.20	\$643.00	\$771.60
Total for Partner	1.20		\$771.60
TOTAL			
	1.20		\$771.60

TOTAL AMOUNT DUE THIS INVOICE	\$	771.60
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REMITTANCE

The Hearst Corporation
Jonathan Donnellan, Esq.
300 West 57th Street
40th Floor
New York, NY 10019

September 30, 2021
Invoice #6848488

Matter Name: Buttar v. Hearst Communications / SF Chronicle
Firm Matter Number: 0063971.000087
DWT Attorney: Thomas Burke (thomasburke@dwt.com)

Client's Matter Number: 2021-LG-1025874

Invoice for Fees and Costs

TOTAL AMOUNT DUE THIS INVOICE

\$771.60

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The Hearst Corporation
Jonathan Donnellan, Esq.
300 West 57th Street
40th Floor
New York, NY 10019

November 30, 2021
Invoice #6863995
ELECTRONIC BILLING

Matter Name: Buttar v. Hearst Communications / SF Chronicle
Firm Matter Number: 0063971.000087
DWT Attorney: Thomas Burke (thomasburke@dwt.com)

Client's Matter Number: 2021-LG-1025874

Invoice for Fees and Costs
ELECTRONIC BILLING – DO NOT MAIL
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Total Current Fees	1,543.20
Total Current Costs	0.00

Total Amount Due This Invoice	\$ 1,543.20
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BILLING SUMMARY

YEAR-TO-DATE

Billed Fees	\$2,314.80
Billed Costs	\$0.00
TOTAL	\$2,314.80

LIFE-TO-DATE

Billed Fees	\$2,314.80
Billed Costs	\$0.00
TOTAL	\$2,314.80

PROFESSIONAL FEES RENDERED:

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<u>DATE</u>	<u>TIMEKEEPER</u>	<u>HOURS</u>	<u>AMOUNT</u>	<u>NARRATIVE</u>
10/27/21	T. Burke	2.20	1,414.60	Further analysis of legal defenses and strategy options for client to avoid discovery (.60); conference with D. Ibarguen regarding strategy issues regarding anti-SLAPP motion (legal standing of campaign vs. Buttar individually, non-compliance with California correction statute, substantial truth, no actual malice) (.80); provide key anti-SLAPP materials to D. Ibarguen (regarding California's correction statute and Rule 12(b)(6) standard used for anti-SLAPP motions in the Ninth Circuit (.40); conference with G. Dutta (counsel for plaintiffs) regarding counsel introduction, California's correction statute and mutual agreement to extend time for Hearst to respond (additional 30 days) and to set-out a joint briefing schedule (.30); update D. Ibarguen regarding extension (.10)
10/28/21	T. Burke	0.20	128.60	Communications to G. Dutta confirming 30-day extension to Hearst, agreement to set joint briefing schedule and seeking approval for joint stipulation confirming same
TOTAL		2.40	\$1,543.20	

TIMEKEEPER SUMMARY			
<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
PARTNER			
Burke, T.	2.40	\$643.00	\$1,543.20
Total for Partner	2.40		\$1,543.20
TOTAL	2.40		\$1,543.20

TOTAL AMOUNT DUE THIS INVOICE	\$	1,543.20
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REMITTANCE

Davis Wright Tremain LLP
PO Box 7410478
Chicago IL 60674-0478

The Hearst Corporation
Jonathan Donnellan, Esq.
300 West 57th Street
40th Floor
New York, NY 10019

November 30, 2021
Invoice #6863995

Matter Name: Buttar v. Hearst Communications / SF Chronicle
Firm Matter Number: 0063971.000087
DWT Attorney: Thomas Burke (thomasburke@dwt.com)

Client's Matter Number: 2021-LG-1025874

Invoice for Fees and Costs

TOTAL AMOUNT DUE THIS INVOICE

\$1,543.20

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The Hearst Corporation
Jonathan Donnellan, Esq.
300 West 57th Street
40th Floor
New York, NY 10019

December 7, 2021
Invoice #6866513
ELECTRONIC BILLING

Matter Name: Buttar v. Hearst Communications / SF Chronicle
Firm Matter Number: 0063971.000087
DWT Attorney: Thomas Burke (thomasburke@dwt.com)

Client's Matter Number: 2021-LG-1025874

Invoice for Fees and Costs
ELECTRONIC BILLING – DO NOT MAIL
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Total Current Fees	5,915.60
Total Current Costs	<u>0.00</u>

Total Amount Due This Invoice	\$ 5,915.60
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OUTSTANDING INVOICES FOR THIS MATTER AS OF: DECEMBER 7, 2021

<u>Invoice</u>	<u>Date</u>	<u>Original Amount</u>	<u>Payments/Credits</u>	<u>Last Payment</u>	<u>Amount Due</u>
6863995	11/30/21	1,543.20	0.00		1,543.20
Previous Balance Total					1,543.20
6866513 (This Invoice)	12/07/21	5,915.60			5,915.60
Total Due This Matter					\$7,458.80

BILLING SUMMARY

YEAR-TO-DATE

Billed Fees	\$8,230.40
Billed Costs	\$0.00
TOTAL	\$8,230.40

LIFE-TO-DATE

Billed Fees	\$8,230.40
Billed Costs	\$0.00
TOTAL	\$8,230.40

PROFESSIONAL FEES RENDERED:

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>HOURS</u>	<u>AMOUNT</u>	<u>NARRATIVE</u>
11/01/21	T. Burke	0.20	128.60	Confirm opposing counsel's approval of stipulation for 30-day extension to file anti-SLAPP motion and follow-up with clients regarding same
11/03/21	T. Burke	0.50	321.50	Further exchange of communications with D. Gautam regarding joint stipulation and extending initial CMC deadline (.20); review and suggest revisions to joint briefing schedule and related exchange of communications with D. Iburguen (.30)
11/08/21	T. Burke	0.20	128.60	Exchange of communications with G. Dutta regarding revised anti-SLAPP briefing schedule (.10); follow-up with D. Iburguen regarding same and plaintiffs' desire to "meet and confer" for initial CMC (.10)
11/09/21	T. Burke	0.40	257.20	Telephone conference with D. Iburguen regarding issues to be covered during CMC conference with plaintiff's counsel (.20); follow-up exchange of communications with G. Dutta regarding rescheduling of "meet and confer" before CMC and his edits to proposed briefing schedule to be submitted to the Court (.20)

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<u>DATE</u>	<u>TIMEKEEPER</u>	<u>HOURS</u>	<u>AMOUNT</u>	<u>NARRATIVE</u>
11/10/21	T. Burke	0.10	64.30	Exchange of communications with D. Ibarguen regarding rescheduling CMC initial discussions with plaintiffs' counsel
11/16/21	T. Burke	0.10	64.30	Exchange of communications with G. Dutta regarding CMC "meet and confer" discussion
11/17/21	T. Burke	2.10	1,350.30	Prepare for and lead "meet and confer" discussions with G. Dutta and D. Ibarguen regarding Rule 26 issues (.60); conference with D. Ibarguen regarding follow-up issues regarding anti-SLAPP motion and pro hac vice applications (.20); prepare summary of key CA anti-SLAPP rulings to consider for prong two arguments in anti-SLAPP brief (1.30)
11/22/21	T. Burke	1.00	643.00	Review draft "certificate of interested parties" and Hearst's inserts for the joint CMC Statement and provide edits to same (.40); conference with D. Ibarguen regarding same (.20); exchange of communications with G. Dutta regarding same and provide consent to file joint briefing stipulation (.20); review plaintiff's draft CMC Statement inserts (.20)
11/23/21	T. Burke	0.80	514.40	Further follow-up communications with G. Dutta and D. Ibarguen regarding changes to joint CMC statement and provide guidance to D. Ibarguen regarding same
11/29/21	T. Burke	2.40	1,543.20	Close review of plaintiffs' complaint and specific factual allegations asserted (as bearing on the anti-SLAPP motion) (.70); review and revise draft anti-SLAPP motion and provide edits and comments to D. Ibarguen regarding same (1.70)
11/30/21	T. Burke	1.40	900.20	Conference with D. Ibarguen regarding refinement of actual malice, substantial truth and disclosed facts opinion arguments for the anti-SLAPP motion (.30); represent Hearst at initial CMC before Judge Chen (via Zoom) (.70); further conference with D. Ibarguen regarding CMC developments and further developing anti-SLAPP legal arguments (.40)
TOTAL		9.20	\$5,915.60	

TIMEKEEPER SUMMARY			
<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
PARTNER			
Burke, T.	9.20	\$643.00	\$5,915.60
Total for Partner	9.20		\$5,915.60
TOTAL	9.20		\$5,915.60

Client Name: Hearst Corporation, The
Firm Matter Number: 0063971.000087
DWT Attorney: Thomas Burke



Invoice # 6866513
Page 4 of 5

TOTAL AMOUNT DUE THIS INVOICE	\$	5,915.60
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Davis Wright Tremain LLP
PO Box 7410478
Chicago IL 60674-0478

The Hearst Corporation
Jonathan Donnellan, Esq.
300 West 57th Street
40th Floor
New York, NY 10019

December 7, 2021
Invoice #6866513

Matter Name: Buttar v. Hearst Communications / SF Chronicle
Firm Matter Number: 0063971.000087
DWT Attorney: Thomas Burke (thomasburke@dwt.com)

Client's Matter Number: 2021-LG-1025874

Invoice for Fees and Costs

TOTAL AMOUNT DUE THIS INVOICE	\$	5,915.60
PRIOR OUTSTANDING BALANCE	\$	1,543.20
TOTAL AMOUNT DUE	\$	7,458.80

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The Hearst Corporation
Jonathan Donnellan, Esq.
300 West 57th Street
40th Floor
New York, NY 10019

January 13, 2022
Invoice #6875505
ELECTRONIC BILLING

Matter Name: Buttar v. Hearst Communications / SF Chronicle
Firm Matter Number: 0063971.000087
DWT Attorney: Thomas Burke (thomasburke@dwt.com)

Client's Matter Number: 2021-LG-1025874

Invoice for Fees and Costs
ELECTRONIC BILLING – DO NOT MAIL
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Total Current Fees	1,093.10
Total Current Costs	<u>0.00</u>

Total Amount Due This Invoice	\$ 1,093.10
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BILLING SUMMARY

YEAR-TO-DATE

Billed Fees	\$1,093.10
Billed Costs	\$0.00
TOTAL	\$1,093.10

LIFE-TO-DATE

Billed Fees	\$9,323.50
Billed Costs	\$0.00
TOTAL	\$9,323.50

PROFESSIONAL FEES RENDERED:

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Client Name: Hearst Corporation, The
Firm Matter Number: 0063971.000087
DWT Attorney: Thomas Burke



Invoice # 6875505
Page 2 of 3

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>HOURS</u>	<u>AMOUNT</u>	<u>NARRATIVE</u>
12/01/21	T. Burke	0.50	321.50	Review revised anti-SLAPP motion and provide feedback to D. Ibarguen regarding same
12/02/21	T. Burke	1.20	771.60	Provide final edits to revised anti-SLAPP motion and related follow-up to D. Ibarguen (1.10); conference with D. Ibarguen regarding guidance regarding filing in the N.D. Cal. (.10)
TOTAL		1.70	\$1,093.10	

TIMEKEEPER SUMMARY			
<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
PARTNER			
Burke, T.	1.70	\$643.00	\$1,093.10
Total for Partner	1.70		\$1,093.10
TOTAL			
	1.70		\$1,093.10

TOTAL AMOUNT DUE THIS INVOICE	\$	1,093.10
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The Hearst Corporation
Jonathan Donnellan, Esq.
300 West 57th Street
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New York, NY 10019

January 13, 2022
Invoice #6875505

Matter Name: Buttar v. Hearst Communications / SF Chronicle
Firm Matter Number: 0063971.000087
DWT Attorney: Thomas Burke (thomasburke@dwt.com)

Client's Matter Number: 2021-LG-1025874

Invoice for Fees and Costs

TOTAL AMOUNT DUE THIS INVOICE	\$	1,093.10
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The Hearst Corporation
Jonathan Donnellan, Esq.
300 West 57th Street
40th Floor
New York, NY 10019

February 23, 2022
Invoice #6885506
ELECTRONIC BILLING

Matter Name: Buttar v. Hearst Communications / SF Chronicle
Firm Matter Number: 0063971.000087
DWT Attorney: Thomas Burke (thomasburke@dwt.com)

Client's Matter Number: 2021-LG-1025874

Invoice for Fees and Costs
ELECTRONIC BILLING – DO NOT MAIL
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Total Current Fees	1,028.80
Total Current Costs	<u>0.00</u>

Total Amount Due This Invoice	\$ 1,028.80
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BILLING SUMMARY

YEAR-TO-DATE

Billed Fees	\$2,121.90
Billed Costs	\$0.00
TOTAL	\$2,121.90

LIFE-TO-DATE

Billed Fees	\$10,352.30
Billed Costs	\$0.00
TOTAL	\$10,352.30

PROFESSIONAL FEES RENDERED:

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Client Name: Hearst Corporation, The
Firm Matter Number: 0063971.000087
DWT Attorney: Thomas Burke



Invoice # 6885506
Page 2 of 3

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>HOURS</u>	<u>AMOUNT</u>	<u>NARRATIVE</u>
01/13/22	T. Burke	0.20	128.60	Review Hearst's draft initial disclosures and related correspondence with D. Ibarguen regarding same
01/14/22	T. Burke	0.20	128.60	Initial review of plaintiff's initial disclosures and alleged damages
01/28/22	T. Burke	0.70	450.10	Close review of Buttar's opposition to Hearst's anti-SLAPP motion and supporting materials
01/31/22	T. Burke	0.50	321.50	Attention to Buttar's reliance on Young v. CBS to argue minimal actual malice burden and outline options for D. Ibarguen to respond to same including concurrent amici effort to address same in ongoing court of appeal lawsuit in California

TOTAL	1.60	\$1,028.80
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TIMEKEEPER SUMMARY			
<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
PARTNER			
Burke, T.	1.60	\$643.00	\$1,028.80
Total for Partner	1.60		\$1,028.80
TOTAL			
	1.60		\$1,028.80

TOTAL AMOUNT DUE THIS INVOICE	\$	1,028.80
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The Hearst Corporation
Jonathan Donnellan, Esq.
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February 23, 2022
Invoice #6885506

Matter Name: Buttar v. Hearst Communications / SF Chronicle
Firm Matter Number: 0063971.000087
DWT Attorney: Thomas Burke (thomasburke@dwt.com)

Client's Matter Number: 2021-LG-1025874

Invoice for Fees and Costs

TOTAL AMOUNT DUE THIS INVOICE	\$	1,028.80
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The Hearst Corporation
Jonathan Donnellan, Esq.
300 West 57th Street
40th Floor
New York, NY 10019

March 22, 2022
Invoice #6891630
ELECTRONIC BILLING

Matter Name: Buttar v. Hearst Communications / SF Chronicle
Firm Matter Number: 0063971.000087
DWT Attorney: Thomas Burke (thomasburke@dwt.com)

Client's Matter Number: 2021-LG-1025874

Invoice for Fees and Costs
ELECTRONIC BILLING – DO NOT MAIL
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Total Current Fees	3,986.60
Less Agreed Upon Discount	(398.66)
Total Current Costs	<u>0.00</u>

Total Amount Due This Invoice	\$ 3,587.94
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OUTSTANDING INVOICES FOR THIS MATTER AS OF: MARCH 22, 2022

<u>Invoice</u>	<u>Date</u>	<u>Original Amount</u>	<u>Payments/Credits</u>	<u>Last Payment</u>	<u>Amount Due</u>
6885506	02/23/22	1,028.80	0.00		1,028.80
Previous Balance Total					1,028.80
6891630 (This Invoice)	03/22/22	3,587.94			3,587.94
Total Due This Matter					\$4,616.74

BILLING SUMMARY

YEAR-TO-DATE

Billed Fees	\$5,709.84
Billed Costs	\$0.00
TOTAL	\$5,709.84

LIFE-TO-DATE

Billed Fees	\$13,940.24
Billed Costs	\$0.00
TOTAL	\$13,940.24

PROFESSIONAL FEES RENDERED:

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>HOURS</u>	<u>AMOUNT</u>	<u>NARRATIVE</u>
02/01/22	T. Burke	2.00	1,286.00	Further analysis of arguments in Buttar's Opposition brief in preparation for discussion with D. Ibarguen (.60); conference with D. Ibarguen regarding reply arguments for the Chronicle regarding Buttar's non-compliance with the CA correction statute (failure to place publisher on notice, identifying factual mistakes, no special damages), plaintiff's actual malice burden under anti-SLAPP, whether to include copy of the supposed "correction demand" to the court; and potential evidence to produce to Buttar in response to discovery requests and strategies for limiting same (including potentially staying anti-SLAPP motion practice to complete discovery if Judge Chen is pre-disposed to deny Hearst's anti-SLAPP motion based on factual concerns) (1.40)
02/07/22	T. Burke	0.80	514.40	Highlight particular CA Corrections statute and anti-SLAPP statute libel cases for particular consideration in Reply brief
02/16/22	T. Burke	1.40	900.20	Close review of draft Reply brief ISO anti-SLAPP motion and provide comments and suggest edits to D. Ibarguen

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<u>DATE</u>	<u>TIMEKEEPER</u>	<u>HOURS</u>	<u>AMOUNT</u>	<u>NARRATIVE</u>
02/17/22	T. Burke	0.30	192.90	Respond to further follow-up from D. Ibarguen regarding issues regarding Reply brief arguments (.20); review and suggest revisions to Hearst's response to
02/22/22	T. Burke	1.40	900.20	Review edits and revisions to Reply brief ISO anti-SLAPP motion and revised D. Ibarguen declaration ISO same (.70); conference with D. Ibarguen regarding final edits to the Reply brief (.70)
02/25/22	T. Burke	0.10	64.30	Exchange of communications with D. Ibarguen regarding Buttar campaign flyer and implications for this libel litigation
02/28/22	T. Burke	0.20	128.60	Review Buttar's objection to submission of email "correction" demand submitted by Hearst in support of its Reply brief and follow-up exchange of communications with
TOTAL		6.20	\$3,986.60	

TIMEKEEPER SUMMARY			
<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
PARTNER			
Burke, T.	6.20	\$643.00	\$3,986.60
Total for Partner	6.20		\$3,986.60
TOTAL	6.20		\$3,986.60

TOTAL AMOUNT DUE THIS INVOICE

\$ 3,587.94



REMITTANCE

Davis Wright Tremain LLP
PO Box 7410478
Chicago IL 60674-0478

The Hearst Corporation
Jonathan Donnellan, Esq.
300 West 57th Street
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New York, NY 10019

March 22, 2022
Invoice #6891630

Matter Name: Buttar v. Hearst Communications / SF Chronicle
Firm Matter Number: 0063971.000087
DWT Attorney: Thomas Burke (thomasburke@dwt.com)

Client's Matter Number: 2021-LG-1025874

Invoice for Fees and Costs

TOTAL AMOUNT DUE THIS INVOICE	\$	3,587.94
PRIOR OUTSTANDING BALANCE	\$	1,028.80
TOTAL AMOUNT DUE	\$	4,616.74

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The Hearst Corporation
Jonathan Donnellan, Esq.
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April 14, 2022
Invoice #6897568
ELECTRONIC BILLING

Matter Name: Buttar v. Hearst Communications / SF Chronicle
Firm Matter Number: 0063971.000087
DWT Attorney: Thomas Burke (thomasburke@dwt.com)

Client's Matter Number: 2021-LG-1025874

Invoice for Fees and Costs
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Total Current Fees	3,086.40
Less Agreed Upon Discount	(308.64)
Total Current Costs	0.00

Total Amount Due This Invoice	\$ 2,777.76
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BILLING SUMMARY

YEAR-TO-DATE

Billed Fees	\$8,487.60
Billed Costs	\$0.00
TOTAL	\$8,487.60

LIFE-TO-DATE

Billed Fees	\$16,718.00
Billed Costs	\$0.00
TOTAL	\$16,718.00

PROFESSIONAL FEES RENDERED:

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<u>DATE</u>	<u>TIMEKEEPER</u>	<u>HOURS</u>	<u>AMOUNT</u>	<u>NARRATIVE</u>
03/01/22	T. Burke	0.50	321.50	Conference with D. Ibarguen regarding whether to seek oral argument (in person) versus a Zoom hearing appearance and related issues and likelihood Judge Chen will allow amendment (per inquiry from reporter) (.40); locate Tawari v. NBCU opinion before Judge Chen and provide same (.10)
03/04/22	T. Burke	0.20	128.60	Exchange of communications with D. Ibarguen regarding plaintiffs' request to "meet and confer" and other issues
03/07/22	T. Burke	0.30	192.90	Conference with J. Donnellan regarding strategy regarding oral argument for anti-SLAPP motion and related considerations
03/09/22	T. Burke	0.50	321.50	Advice to D. Ibarguen regarding handling of CMC statement and discussions regarding discovery/protective order (.30); review draft Joint CMC Statement (.20)
03/10/22	T. Burke	0.40	257.20	Review summary of "meet and confer" efforts regarding Joint Case Management Conference statement and follow-up exchange of communications with D. Ibarguen regarding issues raised by same
03/11/22	T. Burke	1.70	1,093.10	Review anti-SLAPP pleadings and prepare key questions for moot argument by D. Ibarguen (.60); participate (via Teams) in moot argument of D. Ibarguen with R. Sitwala and J. Donnellan in preparation for hearing on the Chronicle's anti-SLAPP motion (1.10)
03/17/22	T. Burke	1.20	771.60	Attend (via Zoom) hearing on the Chronicle's anti-SLAPP motion before Judge Chen (.90) (partially billed); post-hearing conference with D. Ibarguen and J. Donnellan (.30)
TOTAL		4.80	\$3,086.40	

TIMEKEEPER SUMMARY			
<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
PARTNER			
Burke, T.	4.80	\$643.00	\$3,086.40
Total for Partner	4.80		\$3,086.40
TOTAL	4.80		\$3,086.40

TOTAL AMOUNT DUE THIS INVOICE

\$ 2,777.76

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REMITTANCE

Davis Wright Tremain LLP
PO Box 7410478
Chicago IL 60674-0478

The Hearst Corporation
Jonathan Donnellan, Esq.
300 West 57th Street
40th Floor
New York, NY 10019

April 14, 2022
Invoice #6897568

Matter Name: Buttar v. Hearst Communications / SF Chronicle
Firm Matter Number: 0063971.000087
DWT Attorney: Thomas Burke (thomasburke@dwt.com)

Client's Matter Number: 2021-LG-1025874

Invoice for Fees and Costs

TOTAL AMOUNT DUE THIS INVOICE	\$	2,777.76
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The Hearst Corporation
Jonathan Donnellan, Esq.
300 West 57th Street
40th Floor
New York, NY 10019

May 10, 2022
Invoice #6904885
ELECTRONIC BILLING

Matter Name: Buttar v. Hearst Communications / SF Chronicle
Firm Matter Number: 0063971.000087
DWT Attorney: Thomas Burke (thomasburke@dwt.com)

Client's Matter Number: 2021-LG-1025874

Invoice for Fees and Costs
ELECTRONIC BILLING – DO NOT MAIL
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Total Current Fees	321.50
Less Agreed Upon Discount	(32.15)
Total Current Costs	<u>0.00</u>

Total Amount Due This Invoice	\$	289.35
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OUTSTANDING INVOICES FOR THIS MATTER AS OF: MAY 10, 2022

<u>Invoice</u>	<u>Date</u>	<u>Original Amount</u>	<u>Payments/Credits</u>	<u>Last Payment</u>	<u>Amount Due</u>
6897568	04/14/22	2,777.76	0.00		2,777.76
Previous Balance Total					2,777.76
6904885 (This Invoice)	05/10/22	289.35			289.35
Total Due This Matter					\$3,067.11

BILLING SUMMARY

YEAR-TO-DATE

Billed Fees	\$8,776.95
Billed Costs	\$0.00
TOTAL	\$8,776.95

LIFE-TO-DATE

Billed Fees	\$17,007.35
Billed Costs	\$0.00
TOTAL	\$17,007.35

PROFESSIONAL FEES RENDERED:

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>HOURS</u>	<u>AMOUNT</u>	<u>NARRATIVE</u>
04/25/22	T. Burke	0.30	192.90	Review Judge Chen's opinion dismissing plaintiff's lawsuit and related follow-up with D. Ibarguen
04/27/22	T. Burke	0.20	128.60	Conference with D. Ibarguen regarding issues regarding potential amendment by plaintiffs
TOTAL		0.50	\$321.50	

Client Name: Hearst Corporation, The
Firm Matter Number: 0063971.000087
DWT Attorney: Thomas Burke



Invoice # 6904885
Page 3 of 4

TIMEKEEPER SUMMARY			
<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
PARTNER			
Burke, T.	0.50	\$643.00	\$321.50
Total for Partner	0.50		\$321.50
TOTAL	0.50		\$321.50

TOTAL AMOUNT DUE THIS INVOICE	\$	289.35
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Davis Wright Tremain LLP
PO Box 7410478
Chicago IL 60674-0478

The Hearst Corporation
Jonathan Donnellan, Esq.
300 West 57th Street
40th Floor
New York, NY 10019

May 10, 2022
Invoice #6904885

Matter Name: Buttar v. Hearst Communications / SF Chronicle
Firm Matter Number: 0063971.000087
DWT Attorney: Thomas Burke (thomasburke@dwt.com)

Client's Matter Number: 2021-LG-1025874

Invoice for Fees and Costs

TOTAL AMOUNT DUE THIS INVOICE	\$	289.35
PRIOR OUTSTANDING BALANCE	\$	2,777.76
TOTAL AMOUNT DUE	\$	3,067.11

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The Hearst Corporation
Jonathan Donnellan, Esq.
300 West 57th Street
40th Floor
New York, NY 10019

June 23, 2022
Invoice #6914982
ELECTRONIC BILLING

Matter Name: Buttar v. Hearst Communications / SF Chronicle
Firm Matter Number: 0063971.000087
DWT Attorney: Thomas Burke (thomasburke@dwt.com)

Client's Matter Number: 2021-LG-1025874

Invoice for Fees and Costs
ELECTRONIC BILLING – DO NOT MAIL
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Total Current Fees	1,478.90
Less Agreed Upon Discount	(147.89)
Total Current Costs	<u>0.00</u>

Total Amount Due This Invoice	\$ 1,331.01
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OUTSTANDING INVOICES FOR THIS MATTER AS OF: JUNE 23, 2022

<u>Invoice</u>	<u>Date</u>	<u>Original Amount</u>	<u>Payments/Credits</u>	<u>Last Payment</u>	<u>Amount Due</u>
6904885	05/10/22	289.35	0.00		289.35
Previous Balance Total					289.35
6914982 (This Invoice)	06/23/22	1,331.01			1,331.01
Total Due This Matter					\$1,620.36

BILLING SUMMARY

YEAR-TO-DATE

Billed Fees	\$10,107.96
Billed Costs	\$0.00
TOTAL	\$10,107.96

LIFE-TO-DATE

Billed Fees	\$18,338.36
Billed Costs	\$0.00
TOTAL	\$18,338.36

PROFESSIONAL FEES RENDERED:

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>HOURS</u>	<u>AMOUNT</u>	<u>NARRATIVE</u>
05/18/22	T. Burke	0.40	257.20	Telephone conference with plaintiff's counsel regarding S. Buttar's plans to file amended complaint and request for Hearst's agreement to an extended briefing schedule for anticipated second anti-SLAPP motion (.30); update J. Donnellan and D. Ibarguen regarding same (.10)
05/19/22	T. Burke	1.10	707.30	Series of communications with D. Ibarguen regarding proposed scheduling of anticipated second anti-SLAPP motion including stay of discovery and other considerations (.60); conference with G. Dutta regarding same including adjustments to his proposal and follow-up to clients regarding same (.50)
05/20/22	T. Burke	0.40	257.20	Further exchange of communications with G. Dutta regarding adjustments to new briefing schedule and confirm acceptance of same with D. Ibarguen
05/23/22	T. Burke	0.40	257.20	Review and revise joint briefing schedule and submit same to Judge Chen (.20); further exchange of communications with G. Dutta and D. Ibarguen regarding same (.20)

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Client Name: Hearst Corporation, The
Firm Matter Number: 0063971.000087
DWT Attorney: Thomas Burke



Invoice # 6914982
Page 3 of 4

TOTAL	2.30	\$1,478.90
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TIMEKEEPER SUMMARY			
<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
PARTNER			
Burke, T.	2.30	\$643.00	\$1,478.90
Total for Partner	2.30		\$1,478.90
<hr/>			
TOTAL	2.30		\$1,478.90

TOTAL AMOUNT DUE THIS INVOICE	\$	1,331.01
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Davis Wright Tremain LLP
PO Box 7410478
Chicago IL 60674-0478

The Hearst Corporation
Jonathan Donnellan, Esq.
300 West 57th Street
40th Floor
New York, NY 10019

June 23, 2022
Invoice #6914982

Matter Name: Buttar v. Hearst Communications / SF Chronicle
Firm Matter Number: 0063971.000087
DWT Attorney: Thomas Burke (thomasburke@dwt.com)

Client's Matter Number: 2021-LG-1025874

Invoice for Fees and Costs

TOTAL AMOUNT DUE THIS INVOICE	\$	1,331.01
PRIOR OUTSTANDING BALANCE	\$	289.35
TOTAL AMOUNT DUE	\$	1,620.36

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The Hearst Corporation
Jonathan Donnellan, Esq.
300 West 57th Street
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New York, NY 10019

August 19, 2022
Invoice #6929852
ELECTRONIC BILLING

Matter Name: Buttar v. Hearst Communications / SF Chronicle
Firm Matter Number: 0063971.000087
DWT Attorney: Thomas Burke (thomasburke@dwt.com)

Client's Matter Number: 2021-LG-1025874

Invoice for Fees and Costs
ELECTRONIC BILLING – DO NOT MAIL
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Total Current Fees	128.60
Less Agreed Upon Discount	(12.86)
Total Current Costs	<u>0.00</u>

Total Amount Due This Invoice	\$ 115.74
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OUTSTANDING INVOICES FOR THIS MATTER AS OF: AUGUST 19, 2022

<u>Invoice</u>	<u>Date</u>	<u>Original Amount</u>	<u>Payments/Credits</u>	<u>Last Payment</u>	<u>Amount Due</u>
6904885	05/10/22	289.35	0.00		289.35
6914982	06/23/22	1,331.01	0.00		1,331.01
Previous Balance Total					1,620.36
6929852 (This Invoice)	08/19/22	115.74			115.74
Total Due This Matter					\$1,736.10

BILLING SUMMARY

YEAR-TO-DATE

Billed Fees	\$10,223.70
Billed Costs	\$0.00
TOTAL	\$10,223.70

LIFE-TO-DATE

Billed Fees	\$18,454.10
Billed Costs	\$0.00
TOTAL	\$18,454.10

PROFESSIONAL FEES RENDERED:

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>HOURS</u>	<u>AMOUNT</u>	<u>NARRATIVE</u>
07/26/22	T. Burke	0.20	128.60	Attention to multiple inquiries from plaintiffs' counsel regarding further extension request and follow-up with D. Ibarguen regarding same
TOTAL		0.20	\$128.60	

Client Name: Hearst Corporation, The
Firm Matter Number: 0063971.000087
DWT Attorney: Thomas Burke



Invoice # 6929852
Page 3 of 4

TIMEKEEPER SUMMARY			
<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
PARTNER			
Burke, T.	0.20	\$643.00	\$128.60
Total for Partner	0.20		\$128.60
TOTAL	0.20		\$128.60

TOTAL AMOUNT DUE THIS INVOICE	\$	115.74
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PO Box 7410478
Chicago IL 60674-0478

The Hearst Corporation
Jonathan Donnellan, Esq.
300 West 57th Street
40th Floor
New York, NY 10019

August 19, 2022
Invoice #6929852

Matter Name: Buttar v. Hearst Communications / SF Chronicle
Firm Matter Number: 0063971.000087
DWT Attorney: Thomas Burke (thomasburke@dwt.com)

Client's Matter Number: 2021-LG-1025874

Invoice for Fees and Costs

TOTAL AMOUNT DUE THIS INVOICE	\$	115.74
PRIOR OUTSTANDING BALANCE	\$	1,620.36
TOTAL AMOUNT DUE	\$	1,736.10

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The Hearst Corporation
Jonathan Donnellan, Esq.
300 West 57th Street
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September 12, 2022
Invoice #6934515
ELECTRONIC BILLING

Matter Name: Buttar v. Hearst Communications / SF Chronicle
Firm Matter Number: 0063971.000087
DWT Attorney: Thomas Burke (thomasburke@dwt.com)

Client's Matter Number: 2021-LG-1025874

Invoice for Fees and Costs
ELECTRONIC BILLING – DO NOT MAIL
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Total Current Fees	321.50
Less Agreed Upon Discount	(32.15)
Total Current Costs	<u>0.00</u>

Total Amount Due This Invoice	\$ 289.35
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OUTSTANDING INVOICES FOR THIS MATTER AS OF: SEPTEMBER 12, 2022

<u>Invoice</u>	<u>Date</u>	<u>Original Amount</u>	<u>Payments/Credits</u>	<u>Last Payment</u>	<u>Amount Due</u>
6904885	05/10/22	289.35	0.00		289.35
6914982	06/23/22	1,331.01	0.00		1,331.01
6929852	08/19/22	115.74	0.00		115.74
Previous Balance Total					1,736.10
6934515 (This Invoice)	09/12/22	289.35			289.35
Total Due This Matter					\$2,025.45

BILLING SUMMARY

YEAR-TO-DATE

Billed Fees	\$10,513.05
Billed Costs	\$0.00
TOTAL	\$10,513.05

LIFE-TO-DATE

Billed Fees	\$18,743.45
Billed Costs	\$0.00
TOTAL	\$18,743.45

PROFESSIONAL FEES RENDERED:

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>HOURS</u>	<u>AMOUNT</u>	<u>NARRATIVE</u>
08/18/22	T. Burke	0.50	321.50	Review plaintiffs' substantive changes in the first amended complaint (.40); exchange of communications with D. Ibarguen regarding same (.10)
TOTAL		0.50	\$321.50	

Client Name: Hearst Corporation, The
Firm Matter Number: 0063971.000087
DWT Attorney: Thomas Burke



Invoice # 6934515
Page 3 of 4

TIMEKEEPER SUMMARY			
<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
PARTNER			
Burke, T.	0.50	\$643.00	\$321.50
Total for Partner	0.50		\$321.50
TOTAL	0.50		\$321.50

TOTAL AMOUNT DUE THIS INVOICE	\$	289.35
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The Hearst Corporation
Jonathan Donnellan, Esq.
300 West 57th Street
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New York, NY 10019

September 12, 2022
Invoice #6934515

Matter Name: Buttar v. Hearst Communications / SF Chronicle
Firm Matter Number: 0063971.000087
DWT Attorney: Thomas Burke (thomasburke@dwt.com)

Client's Matter Number: 2021-LG-1025874

Invoice for Fees and Costs

TOTAL AMOUNT DUE THIS INVOICE	\$	289.35
PRIOR OUTSTANDING BALANCE	\$	1,736.10
TOTAL AMOUNT DUE	\$	2,025.45

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The Hearst Corporation
Jonathan Donnellan, Esq.
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New York, NY 10019

October 11, 2022
Invoice #6943568
ELECTRONIC BILLING

Matter Name: Buttar v. Hearst Communications / SF Chronicle
Firm Matter Number: 0063971.000087
DWT Attorney: Thomas Burke (thomasburke@dwt.com)

Client's Matter Number: 2021-LG-1025874

Invoice for Fees and Costs
ELECTRONIC BILLING – DO NOT MAIL
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Total Current Fees	450.10
Less Agreed Upon Discount	(45.01)
Total Current Costs	<u>0.00</u>

Total Amount Due This Invoice	\$	405.09
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OUTSTANDING INVOICES FOR THIS MATTER AS OF: OCTOBER 11, 2022

<u>Invoice</u>	<u>Date</u>	<u>Original Amount</u>	<u>Payments/Credits</u>	<u>Last Payment</u>	<u>Amount Due</u>
6904885	05/10/22	289.35	0.00		289.35
6914982	06/23/22	1,331.01	0.00		1,331.01
6934515	09/12/22	289.35	0.00		289.35
Previous Balance Total					1,909.71
6943568 (This Invoice)	10/11/22	405.09			405.09
Total Due This Matter					\$2,314.80

BILLING SUMMARY

YEAR-TO-DATE

Billed Fees	\$10,918.14
Billed Costs	\$0.00
TOTAL	\$10,918.14

LIFE-TO-DATE

Billed Fees	\$19,148.54
Billed Costs	\$0.00
TOTAL	\$19,148.54

PROFESSIONAL FEES RENDERED:

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>HOURS</u>	<u>AMOUNT</u>	<u>NARRATIVE</u>
09/22/22	T. Burke	0.70	450.10	Review and revise second anti-SLAPP Motion and provide guidance to D. Ibarguen regarding issues regarding same
TOTAL		0.70	\$450.10	

Client Name: Hearst Corporation, The
Firm Matter Number: 0063971.000087
DWT Attorney: Thomas Burke



Invoice # 6943568
Page 3 of 4

TIMEKEEPER SUMMARY			
<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
PARTNER			
Burke, T.	0.70	\$643.00	\$450.10
Total for Partner	0.70		\$450.10
TOTAL	0.70		\$450.10

TOTAL AMOUNT DUE THIS INVOICE

\$ 405.09

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The Hearst Corporation
Jonathan Donnellan, Esq.
300 West 57th Street
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New York, NY 10019

October 11, 2022
Invoice #6943568

Matter Name: Buttar v. Hearst Communications / SF Chronicle
Firm Matter Number: 0063971.000087
DWT Attorney: Thomas Burke (thomasburke@dwt.com)

Client's Matter Number: 2021-LG-1025874

Invoice for Fees and Costs

TOTAL AMOUNT DUE THIS INVOICE	\$	405.09
PRIOR OUTSTANDING BALANCE	\$	1,909.71
TOTAL AMOUNT DUE	\$	2,314.80

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300 West 57th Street
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November 15, 2022
Invoice #6953503
ELECTRONIC BILLING

Matter Name: Buttar v. Hearst Communications / SF Chronicle
Firm Matter Number: 0063971.000087
DWT Attorney: Thomas Burke (thomasburke@dwt.com)

Client's Matter Number: 2021-LG-1025874

Invoice for Fees and Costs
ELECTRONIC BILLING – DO NOT MAIL
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Total Current Fees	771.60
Less Agreed Upon Discount	(77.16)
Total Current Costs	0.00

Total Amount Due This Invoice	\$	694.44
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BILLING SUMMARY

YEAR-TO-DATE

Billed Fees	\$11,612.58
Billed Costs	\$0.00
TOTAL	\$11,612.58

LIFE-TO-DATE

Billed Fees	\$19,842.98
Billed Costs	\$0.00
TOTAL	\$19,842.98

PROFESSIONAL FEES RENDERED:

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<u>DATE</u>	<u>TIMEKEEPER</u>	<u>HOURS</u>	<u>AMOUNT</u>	<u>NARRATIVE</u>
10/18/22	T. Burke	0.40	257.20	Attention to request to permit the filing of amici support for Buttar in the district court and advice to D. Ibarguen and J. Donnellan regarding handling of same (.20); further exchange with D. Ibarguen regarding same (.20)
10/25/22	T. Burke	0.80	514.40	Review plaintiffs' Opposition papers and compare arguments raised in first Opposition to anti-SLAPP (.70); follow-up with D. Ibarguen (.10)
TOTAL		1.20	\$771.60	

TIMEKEEPER SUMMARY			
<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
PARTNER			
Burke, T.	1.20	\$643.00	\$771.60
Total for Partner	1.20		\$771.60
TOTAL			
	1.20		\$771.60

TOTAL AMOUNT DUE THIS INVOICE	\$	694.44
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The Hearst Corporation
Jonathan Donnellan, Esq.
300 West 57th Street
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New York, NY 10019

November 15, 2022
Invoice #6953503

Matter Name: Buttar v. Hearst Communications / SF Chronicle
Firm Matter Number: 0063971.000087
DWT Attorney: Thomas Burke (thomasburke@dwt.com)

Client's Matter Number: 2021-LG-1025874

Invoice for Fees and Costs

TOTAL AMOUNT DUE THIS INVOICE	\$	694.44
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The Hearst Corporation
Jonathan Donnellan, Esq.
300 West 57th Street
40th Floor
New York, NY 10019

December 5, 2022
Invoice #6958711
ELECTRONIC BILLING

Matter Name: Buttar v. Hearst Communications / SF Chronicle
Firm Matter Number: 0063971.000087
DWT Attorney: Thomas Burke (thomasburke@dwt.com)

Client's Matter Number: 2021-LG-1025874

Invoice for Fees and Costs
ELECTRONIC BILLING – DO NOT MAIL
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Total Current Fees	321.50
Less Agreed Upon Discount	(32.15)
Total Current Costs	<u>0.00</u>

Total Amount Due This Invoice	\$	289.35
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OUTSTANDING INVOICES FOR THIS MATTER AS OF: DECEMBER 5, 2022

<u>Invoice</u>	<u>Date</u>	<u>Original Amount</u>	<u>Payments/Credits</u>	<u>Last Payment</u>	<u>Amount Due</u>
6953503	11/15/22	694.44	0.00		694.44
Previous Balance Total					694.44
6958711 (This Invoice)	12/05/22	289.35			289.35
Total Due This Matter					\$983.79

BILLING SUMMARY

YEAR-TO-DATE

Billed Fees	\$11,901.93
Billed Costs	\$0.00
TOTAL	\$11,901.93

LIFE-TO-DATE

Billed Fees	\$20,132.33
Billed Costs	\$0.00
TOTAL	\$20,132.33

PROFESSIONAL FEES RENDERED:

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>HOURS</u>	<u>AMOUNT</u>	<u>NARRATIVE</u>
11/12/22	T. Burke	0.50	321.50	Review and suggest revisions to draft Reply in support of anti-SLAPP motion to first amended complaint
TOTAL		0.50	\$321.50	

Client Name: Hearst Corporation, The
Firm Matter Number: 0063971.000087
DWT Attorney: Thomas Burke



Invoice # 6958711
Page 3 of 4

TIMEKEEPER SUMMARY			
<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
PARTNER			
Burke, T.	0.50	\$643.00	\$321.50
Total for Partner	0.50		\$321.50
TOTAL	0.50		\$321.50

TOTAL AMOUNT DUE THIS INVOICE	\$	289.35
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Chicago IL 60674-0478

The Hearst Corporation
Jonathan Donnellan, Esq.
300 West 57th Street
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New York, NY 10019

December 5, 2022
Invoice #6958711

Matter Name: Buttar v. Hearst Communications / SF Chronicle
Firm Matter Number: 0063971.000087
DWT Attorney: Thomas Burke (thomasburke@dwt.com)

Client's Matter Number: 2021-LG-1025874

Invoice for Fees and Costs

TOTAL AMOUNT DUE THIS INVOICE	\$	289.35
PRIOR OUTSTANDING BALANCE	\$	694.44
TOTAL AMOUNT DUE	\$	983.79

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The Hearst Corporation
Jonathan Donnellan, Esq.
300 West 57th Street
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January 13, 2023
Invoice #6968902
ELECTRONIC BILLING

Matter Name: Buttar v. Hearst Communications / SF Chronicle
Firm Matter Number: 0063971.000087
DWT Attorney: Thomas Burke (thomasburke@dwt.com)

Client's Matter Number: 2021-LG-1025874

Invoice for Fees and Costs
ELECTRONIC BILLING – DO NOT MAIL
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Total Current Fees	385.80
Less Agreed Upon Discount	(38.58)
Total Current Costs	0.00

Total Amount Due This Invoice	\$	347.22
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BILLING SUMMARY

YEAR-TO-DATE

Billed Fees	\$347.22
Billed Costs	\$0.00
TOTAL	\$347.22

LIFE-TO-DATE

Billed Fees	\$20,479.55
Billed Costs	\$0.00
TOTAL	\$20,479.55

PROFESSIONAL FEES RENDERED:

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<u>DATE</u>	<u>TIMEKEEPER</u>	<u>HOURS</u>	<u>AMOUNT</u>	<u>NARRATIVE</u>
12/07/22	T. Burke	0.10	64.30	Advice to D. Ibarguen regarding response to plaintiffs' counsel's request to move hearing date for second anti-SLAPP motion
12/08/22	T. Burke	0.20	128.60	Further exchange of communications with D. Ibarguen regarding strategy to address
12/11/22	T. Burke	0.20	128.60	Review draft stipulation to further extend hearing date on second anti-SLAPP motion
12/12/22	T. Burke	0.10	64.30	Exchange of communications with D. Ibarguen regarding approval of revised joint stipulation to move the date of the hearing on the second anti-SLAPP motion
TOTAL		0.60	\$385.80	

TIMEKEEPER SUMMARY			
<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
PARTNER			
Burke, T.	0.60	\$643.00	\$385.80
Total for Partner	0.60		\$385.80
TOTAL			
	0.60		\$385.80

TOTAL AMOUNT DUE THIS INVOICE	\$	347.22
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REMITTANCE

Davis Wright Tremain LLP
PO Box 7410478
Chicago IL 60674-0478

The Hearst Corporation
Jonathan Donnellan, Esq.
300 West 57th Street
40th Floor
New York, NY 10019

January 13, 2023
Invoice #6968902

Matter Name: Buttar v. Hearst Communications / SF Chronicle
Firm Matter Number: 0063971.000087
DWT Attorney: Thomas Burke (thomasburke@dwt.com)

Client's Matter Number: 2021-LG-1025874

Invoice for Fees and Costs

TOTAL AMOUNT DUE THIS INVOICE	\$	347.22
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To ensure proper credit to your account,
please include remittance with your payment.

Exhibit C

**U.S. District Court
California Northern District
Internet Payment History for Donnellan, Jonathan R.
11/18/2021 to 3/1/2023**

Case no.	Date Paid	Description	Payment Method	Receipt #	Amount
<u>3:21-cv-05566-EMC</u>	2021-11-18 11:35:27	Motion for Pro Hac Vice(<u>3:21-cv-05566-EMC</u>) [motion pro hac] (317.00)	cr card	ACANDC-16640746	\$ 317.00

From: do_not_reply@psc.uscourts.gov
To:
Subject: [EXTERNAL] Pay.gov Payment Confirmation: CALIFORNIA NORTHERN DISTRICT COURT
Date: Thursday, November 18, 2021 2:35:46 PM

Your payment has been successfully processed and the details are below. If you have any questions or you wish to cancel this payment, please contact: ECF Help Desk at 866-638-7829.

Account Number: 4369347
Court: CALIFORNIA NORTHERN DISTRICT COURT
Amount: \$317.00
Tracking Id: ACANDC-16640746
Approval Code: 120495
Card Number: *****1006
Date/Time: 11/18/2021 02:35:27 ET

NOTE: This is an automated message. Please do not reply

Exhibit D

**U.S. District Court
California Northern District
Internet Payment History for Ibarguen, Diego
11/18/2021 to 3/1/2023**

Case no.	Date Paid	Description	Payment Method	Receipt #	Amount
<u>3:21-cv-05566-EMC</u>	2021-11-18 11:38:26	Motion for Pro Hac Vice(<u>3:21-cv-05566-EMC</u>) [motion pro hac] (317.00)	cr card	ACANDC-16640851	\$ 317.00

From: do_not_reply@psc.uscourts.gov
To:
Subject: [EXTERNAL] Pay.gov Payment Confirmation: CALIFORNIA NORTHERN DISTRICT COURT
Date: Thursday, November 18, 2021 2:38:35 PM

Your payment has been successfully processed and the details are below. If you have any questions or you wish to cancel this payment, please contact: ECF Help Desk at 866-638-7829.

Account Number: 5633193
Court: CALIFORNIA NORTHERN DISTRICT COURT
Amount: \$317.00
Tracking Id: ACANDC-16640851
Approval Code: 169836
Card Number: *****1006
Date/Time: 11/18/2021 02:38:25 ET

NOTE: This is an automated message. Please do not reply